

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA)	Criminal No. 3:22-cr- 124 (DJN)
)	
v.)	Count 1: Conspiracy to Launder
)	Monetary Instruments
HAKHYUN CHUN,)	(18 U.S.C. §§ 1956(h) and 1957)
)	
<i>Defendant.</i>)	Forfeiture Notice

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

(Conspiracy to Launder Monetary Instruments)

THE CONSPIRACY

From on or before September 26, 2018, the exact date being unknown, through December 26, 2018, in the Eastern District of Virginia and elsewhere, the defendant, HAKHYUN CHUN, did knowingly combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956 and Section 1957, that is, to knowingly engage and attempt to engage, in monetary transactions by, through or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is, a wire transfer of \$29,000.00, such property having been derived from a specified unlawful activity, that is, conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1957.

GENERAL ALLEGATIONS

Both the Bank of Hope and Wells Fargo Bank are “financial institutions” as that term is defined in Title 18, United States Code, Section 20.

MANNER AND MEANS

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

- a. On or about August 17, 2017, defendant HAKHYUN CHUN requested and directed an individual identified herein as “S.C.” to open a checking account with the Bank of Hope in Los Angeles, California, in the name of CHUN’s business, EDHD, Inc.;
- b. On or about August 17, 2017, “S.C.” opened a checking account with the Bank of Hope in the name of EDHD Inc., which was assigned an account number ending in 3483 (hereafter “Bank of Hope account 3483”);
- c. Sometime before December 1, 2018, the defendant HAKHYUN CHUN agreed with another individual to make available Bank of Hope account 3483 for the purpose of receiving funds that the defendant knew, or was willfully blind to the fact, would be derived from some form of illegal activity;
- d. On or about December 20, 2018, Bank of Hope account 3483 received an ACH wire transfer in the amount of \$469,819.44 from Virginia Commonwealth University in Richmond, Virginia, which constituted proceeds derived from the offense of conspiracy to commit wire fraud;
- e. On December 21, 2018, the defendant HAKHYUN CHUN transferred and caused to be transferred an outgoing wire of \$29,000.00 from Bank of Hope

account 3483 to a Wells Fargo Bank account with account number ending in 4282, made payable to an individual identified herein as "S.C."

(All in violation of Title 18, United States Code, Sections 1956(h) and 1957).

FORFEITURE

Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, the defendant, upon conviction of Count One of the Criminal Information, shall forfeit to the United States, any property, real or personal, involved in such offense or any property traceable to such property.

If the property subject to forfeiture meets the requirements of 21 U.S.C § 853(p), the United States will seek an order forfeiting substitute assets.

(All in accordance with Title 18, United States Code, Section 982(a)(1), and Title 21, United States Code, Section 853(p).)

Respectfully submitted,

JESSICA D. ABER
UNITED STATES ATTORNEY

By: 

Brian R. Hood
Pennsylvania Bar No. 74635
Senior Litigation Counsel
United States Attorney's Office
919 East Main Street, Suite 1900
Richmond, VA 23219
Phone: (804) 819-5400
Fax: (804) 771-2316
Email: brian.hood@usdoj.gov